

IN THE UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF INDIANA
INDIANAPOLIS DIVISION

ESTATE OF ELEANOR NORTINGTON,)

Plaintiff,)

v.)

CITY OF INDIANAPOLIS, LANE COOPER,)

ROBERT HALEY, JR., JUSTIN HYDE,)

BRUCE JACKSON, AND)

RONALD MONDAY,)

Defendants.)

Case No. 1:21-cv-406-TWP-TAB

AFFIDAVIT OF LANE COOPER

I, Lane Cooper, being duly sworn and under oath, testifies that:

1. I am over the age of eighteen.
2. I am competent to testify about the facts in this affidavit, and it is based on my personal knowledge.
3. I am a patrol officer for the Indianapolis Metropolitan Police Department ("IMPD") and have been so employed since December 2016.
4. On February 6, 2019, I was working within the course and scope of my employment with the City of Indianapolis when I responded to a call for service at the church where Eleanor Northington was having a mental crisis, disrupting the church service, and physically assaulting people.
5. I sustained injuries to my head when Ms. Northington struck my head with the bottom of her closed fist (i.e., hammer fisting) multiple times while I,

along with other officers, tried to detain her in handcuffs.

6. Officers, including myself, were attempting to conduct an immediate detention of Ms. Northington so she could be taken to the hospital and obtain whatever treatment was recommended by medical professionals.
7. My height is 5'11" and my weight is 160 pounds. My height and weight have not changed since February 2019.
8. When a credible allegation exists that an IMPD officer may have committed a criminal offense—in connection with or outside of their duties as a police officer—IMPD's special investigations unit ("SIU") will conduct an investigation. The results of that investigation, and the evidence gathered from it, are provided and the Marion County Prosecutor's Office ("MCPO") to determine whether criminal charges should be filed against the officer.
9. MCPO ultimately determines whether criminal charges should be filed against the officer. IMPD has no input on that matter.
10. IMPD did not conduct any SIU investigation in connection with the February 6, 2019 incident.
11. I was not charged with any criminal offense for my February 6, 2019 conduct.
12. An internal affairs ("IA") investigation was conducted by IMPD concluded that I did not violate any of IMPD's rules, regulations, or general orders.

FURTHER AFFIANT SAYETH NAUGHT.

AFFIRMATION

I hereby affirm under the penalties of perjury that the foregoing representations are true to the best of my knowledge and belief.

3/25/22
Dated

LS Cooper
Lane Cooper